



Third-Party Supplemental Environmental Project (SEP) Proposal / Agreement

Third-party (Revised 12/19/2023)

Document is completed by the third-party SEP administrator for review and approval by CDPHE and the regulated entity.

The regulated entity (source), identified below, and the third-party SEP administrator, identified below, submit the following SEP agreement proposal to the Colorado Department of Public Health and Environment (the department) for consideration. If the application is approved, it shall be signed by appropriate representatives of the department. If the approved document is then signed by the applicant, it shall serve as the SEP agreement for the project(s) at issue.

Enforcement action information

Regulated entity name: Town of Erie

Enforcement case no.: DO-200909-1

Regulated entity

Todd Fessenden, Utilities Director

Town of Erie

645 Holbrook Street,

Erie, Colorado 80516

303-926-2895

tfessenden@erieco.org

Third-party SEP administrator

Kim Orr, Director, School Recycling and Environmental Education Program

Eco-Cycle

6400 Arapahoe Road

Boulder, CO 80303

303-444-6634 ext 208

kim@ecocycle.org

Type of organization

Nonprofit organization

*If nonprofit, please attach a copy of your 501c(3) exemption to this SEP Agreement.

Department SEP Coordinator

Alex Scherer, SEP Coordinator
Supplemental Environmental Projects Coordinator
alex.scherer@state.co.us

Geographic area served

Town of Erie and City/County of Broomfield.

SEP category

Pollution reduction, environmental education, and public health and safety.

Project title

School Waste Diversion Project: Eco-Cycle's Green Star Schools and Reusable Zero Waste Event Kits.

Project summary

This SEP project consists of two parts and will reduce waste generated at schools in and near Erie thereby reducing waste landfilled in the Front Range Landfill.

1. Eco-Cycle's Green Star Schools Program
Additional schools will have the opportunity to join the Green Star Schools (GSS) Program. Eco-Cycle's GSS Program will introduce compost collection, improve recycling, and promote reuse through an extensive and ongoing education program to reduce landfill waste generated at schools in and near Erie. This project will fund six new GSS.
2. Reusable Zero Waste Event Kits
Reusable Zero Waste Event Kits include 30 reusable plates, cups, spoons, forks, and cloth napkins in a reusable storage container. Each kit also contains an instruction sheet. Zero Waste Event Kits replace single-use disposables and can be used at school-sponsored events where food and drinks are served. These events may include but are not limited to classroom celebrations, staff meetings, teacher conference dinners, PTO and PTA meetings, and larger school community events such as dances and graduations. After use, the kit materials are washed by school staff or adult volunteers and returned for reuse. This project will furnish 20 kits to Erie schools in BVSD and SVVSD.

Project Description

Funding from this SEP project will reduce waste generated at schools and landfilled at the Front Range Landfill in Erie.

1. Eco-Cycle's Green Star Schools

Waste diversion will be accomplished by adding six new schools to the GSS Program in and near Erie.

Landfilling results in the loss of natural resources, habitat loss, and water pollution. The Front Range Landfill is located in Erie. As a result, the Town of Erie is directly and heavily impacted by landfill operations.

Eco-Cycle's GSS Program introduces compost collection to schools, improves recycling, and puts a strong emphasis on waste reduction activities. The program provides participating schools with extensive and ongoing support, feedback, incentives, rewards, and special projects. This program is key to helping create environmentally literate graduates as well as creating behavior change resulting in a reduction of landfilled material in schools that ripples into the community.

Funding from this project will allow Eco-Cycle's GSS Program to be offered to Town of Erie schools and Broomfield schools spanning two school districts, Adams 12 Five Star and BVSD. The GSS Program will coordinate with each school district, the Town of Erie, and school administration to determine which eligible schools will become part of the GSS Program. Six new schools will be funded to join the GSS Program through this project.

Project Objectives:

- The GSS Program will reduce the amount of landfill materials generated in schools through education and the implementation of composting of food scraps in school cafeterias and kitchens.
- The GSS Program will reduce the amount of landfill materials generated in schools through education and improved recycling.
- The GSS Program will reduce the amount of landfill materials generated in schools by educating students and staff on the importance of reuse as the best way to reduce waste.
- The GSS Program education will create behavior change in school staff and students which will ripple into the community.
- The Town of Erie will realize direct benefits to their public health and environment with a reduction of materials disposed of at the Front Range Landfill.

ENVIRONMENTAL BENEFITS: COMPOST, RECYCLING, AND LANDFILL DATA

- Eco-Cycle will facilitate the sharing of recycling, compost, and landfill weights for each GSS school with the Town of Erie per each district's hauling contracts. This data will provide valuable feedback on the amount of materials diverted from the landfill to recycling and compost at each GSS school.

Eco-Cycle's data analysis from 32 GSS Schools in BVSD shows the following diversion rates at each type of school:

- Elementary Schools: 56%
- Middle Schools: 45%
- PK-8 Schools: 47%
- High Schools: 21%

There is a variation between the diversion rates at the different types of schools. Elementary schools tend to have the highest diversion rates as they have closed campuses and cafeterias are often able to utilize more reusable food serviceware. Middle schools tend to use more disposable food serviceware compared to elementary schools, which results in more trash being generated at lunch. Middle school students also tend to consume more of their food leading to fewer food scraps being composted. Finally, high schools demonstrate the lowest

diversion for a few reasons. High schools are open campuses. Many students leave school to purchase lunch and return to school with their single-use items acquired off campus, which are most often sent to the landfill. High school students tend to eat their food, so there are fewer food scraps to be composted. High school buildings are frequently used for school events and outside rentals. These events generate additional discards outside of the school day and the control of the GSS Program, resulting in more landfilled waste.

Compost weights are regularly reported by the hauler for each school dependent on their contract with the school district. The average pounds composted per year at each type of school is listed below.

- Elementary Schools: 7,000
- Middle Schools: 3,700
- PK-8 Schools: 4,300
- High Schools: 4,500

Diverting food scraps from the landfill and redirecting them to compost will have a significant positive impact on the Town of Erie and its residents. Less organic matter will be landfilled, resulting in a reduction of methane and carbon dioxide generated at the Front Range Landfill in Erie.

BEHAVIORAL CHANGE

The GSS Program educates and supports school staff and students on the impacts of waste, how to recycle and compost right, and the value of reducing waste through reuse. During the implementation of this project, Eco-Cycle's GSS schools will develop and distribute a survey for students and staff to assess their waste reduction knowledge and behaviors prior to joining the GSS Program. Several weeks after the completion of the GSS launch, staff and students at the school will be asked to complete an additional survey to reassess their waste reduction knowledge and behaviors.

This pre and post survey will be unique to this SEP project. Eco-Cycle's GSS schools will coordinate the implementation of the survey with district sustainability managers and school administration.

Project tasks and activities:

Schools joining the GSS Program complete activities with coordination and support from Eco-Cycle's GSS Program Manager and Coordinator.

GSS Preparation Activities:

1. Introductory Principal Meeting
2. Principal & Custodial Meeting (GSS launch logistics, long-term plan for GSS engagement)
3. Student Group Meetings (introduction, waste audit, student group peer messaging)
4. Faculty & Staff Trainings (~30 mins)
 - a. Faculty & Staff
 - b. Custodial (day and evening)
 - c. Kitchen
 - d. Lunchroom support staff/ paraeducators*

**dedicated training is preferred, but training can happen when Eco-Cycle is on-site for lunchroom monitoring.*

Eco-Cycle will complete a walk-through of the school building with the custodian. The walk-through ensures all classroom and hallway recycling and landfill receptacles are co-located and well-labeled. The walk-through will also include the cafeteria. Eco-Cycle's GSS Program Manager will work with the custodian to design the cafeteria sorting station in a manner that functions well in the space, for the students, and the custodian. Containers and signage will be provided in compliance with each district's agreement with Eco-Cycle. Finally, Eco-Cycle will coordinate the type of outdoor compost container and the placement of that container with the head custodian.

Once preparation activities are complete the school moves on to the next stage of launch activities.

GSS Launch Activities:

1. All-student education (~30 mins): individual classes, or grade-level
2. Monitoring in the lunchroom for 3-6 weeks following education by Eco-Cycle, student volunteers, school staff, and/or parent volunteers.
3. Sorting Wheel Activities: students spin the sorting wheel for an opportunity to win an Eco-Cycle-provided prize drawing (during recess or lunch).
4. Messaging: school announcements, staff letter, and parent/community letter.

After completion of the launch activities, GSS schools advance to the maintenance phase of the program.

GSS Maintenance Activities and Requirements:

1. Zero Waste or Sustainability Advocate: This school contact person facilitates communications and needs about the GSS Program with Eco-Cycle.

Responsibilities of the Zero Waste or Sustainability Advocate:

- Coordinate with the school custodian or principal to communicate recycle or compost collection issues or other GSS-related needs with Eco-Cycle/GSS Program Manager. Forward Eco-Cycle's environmental education programs flyers to teachers each fall.
- Communicate periodically about Eco-Cycle's special projects and promotion opportunities to school staff and the community.
- Order and distribute collection materials (posters and classroom containers) throughout the school building each fall (if needed) and establish their safe storage during school breaks.
- Update the school's paper recycling collection data found in monthly emails from Eco-Cycle. The school impact data should be posted/displayed in a common area of the school.

Additional Activities Optional Activities might include:

- Supervise a student group that helps promote recycling and waste reduction, and any other sustainable practices at your school. Notify the GSS Program Manager of upcoming school-wide events that could be made
- Composting will be allowed at Zero Waste Events with support from Eco-Cycle. Eco-Cycle staff are available to help with Zero Waste Event planning, sorting station monitoring, and/or tabling at the event.

A. ANNUAL EDUCATION REQUIREMENTS

- School Staff: in the form of a video and quiz or an in-person training. The format and requirements are determined in partnership with each school district.
- Students: Elementary: Kindergarten and either 3rd or 4th grade (school choice), Middle: 6th grade, High: 9th grade
- Optional: Custodial, kitchen, and paraeducator/school support staff training.
- Eco-Cycle is also available to present to PTO/PTA about waste reduction tips and hosting Zero Waste Events during school events, activities, and celebrations.

B. NEW SCHOOL STAFF ON-BOARDING

- Introductory meeting with Eco-Cycle and new school principals, head custodians, and Zero Waste Advocates to discuss and answer questions about their role in the GSS Program.

Eco-Cycle's GSS schools have access to benefits and resources. These include:

- Children's books through Eco-Cycle's CHaRMed Book Program
- Green Team support
- GSS Mini-Grant for reusables
- Zero Waste Event Support
- GSS Newsletter
- Classroom Celebration Waste Reduction Tips
- Eco-Cycle's Holiday Guide
- GSS Celebrations
- GSS Special promotions and contests

Eligible schools will be offered the opportunity to express their interest in becoming part of the GSS Program in the summer preceding and in the early fall of the school year.

The SEP will take a tiered approach. A tiered approach is necessary to accommodate for different situations at each school. Staffing can heavily impact the ability of a school to successfully support the GSS Program. When schools are understaffed or in a staffing transition they may choose to delay joining the GSS Program.

In Erie, there is one non-Green Star School in BVSD school and six non-GSS schools in SVVSD. SVVSD schools are not represented in the GSS Tiers. As a result of significant custodial understaffing, SVVSD Erie schools are not able to engage in the GSS Program during the SEP. The remaining eligible schools are prioritized based on their proximity to the Front Range Landfill and the Town of Erie.

The Tier 1 school and Tier 2 schools will be offered the first opportunity to join the GSS Program for the 2024-25 school year. Up to three schools may join the GSS Program during the 2024-25 school year.

The process will repeat in the spring of 2025 and early fall of 2025 with Tier 1 and Tier 2 schools being offered the first opportunity to express their interest in joining the GSS Program for the 2025-26 school year. If any GSS slots remain available, Tier 3 schools will be offered the opportunity to express their interest in joining the GSS Program.

A total of six schools will be able to join the GSS Program between Fall 2024 - Fall 2026.

Tier 1:

1. Meadowlark PK-8 (BVSD, Erie)

Tier 2:

2. Aspen Creek PK-8 (BVSD, Broomfield)
3. Broomfield Heights Elementary (BVSD, Broomfield)
4. Broomfield High (BVSD, Broomfield)
5. Emerald Elementary (BVSD, Broomfield)
6. Kohl Elementary (BVSD, Broomfield)

Tier 3

7. Centennial Elementary (Adams 12 Five Star, Broomfield)
8. Coyote Ridge (Adams 12 Five Star, Broomfield)
9. Legacy High (Adams 12 Five Star, Broomfield)
10. Meridian Elementary (Adams 12 Five Star, Broomfield)
11. Mountain View Elementary (Adams 12 Five Star, Broomfield)
12. Thunder Vista PK-8 (Adams 12 Five Star, Broomfield)
13. Westlake Middle (Adams 12 Five Star, Broomfield)

2. Reusable Zero Waste Event Kits

Additionally, waste diversion will be accomplished by supporting Erie schools with the opportunity to replace single-use disposable food serviceware with reusable serviceware.

Each Reusable Zero Waste Event Kit includes 30 reusable plates, cups, spoons, forks, and cloth napkins in a reusable storage container. Each kit contains an instruction sheet.

Zero Waste Event Kits replace single-use disposables with reusables and can be used at school-sponsored events where food and drinks are served. These events may include but are not limited to classroom celebrations, staff meetings, teacher conference dinners, PTO and PTA meetings, and larger school community events such as dances and graduations. After use, the kit materials are washed by school staff or adult volunteers and returned for reuse.

20 kits will be made available to Erie public schools in BVSD and SVVSD through an application process that will open in January 2025. Schools will apply by submitting information through a Google form. Each applicant will indicate information such as the number of kits requested (maximum of three), a feasible plan to store, distribute, and maintain the kits, what types of events the kits will be used for, the projected impact on waste reduction and how many people it will impact, details on the school staff who will help support and maintain the Zero Waste Event Kits over time, and any other waste reduction projects the school has implemented. Applicants will be scored based on their responses and kits will be awarded accordingly. Eco-Cycle will present the Zero Waste Event Kits to all teachers in a faculty presentation. In addition, information on the kits will be provided to school principals to forward to their PTO/PTA. These 20 kits will be distributed to awarded schools and faculty presentations will take place during the spring semester in 2025.

Schools Eligible to apply for Reusable Zero Waste Event Kits:

1. Black Rock Elementary (SVVSD, Erie)
2. Erie Elementary (SVVSD, Erie)
3. Erie Middle (SVVSD, Erie)
4. Erie High (SVVSD, Erie)
5. Meadowlark (BVSD, Erie)

6. Highlands Elementary (SVVSD, Erie)
7. Red Hawk Elementary (SVVSD, Erie)
8. Soaring Heights PK-8 (SVVSD, Erie)

Eco-Cycle's Partners and roles: Eco-Cycle coordinates with BVSD and SVVSD. Eco-Cycle's GSS Program first coordinates with the BVSDs Energy and Sustainability Manager and SVVSDs Environmental Health and Safety/Energy and Sustainability Manager. Eco-Cycle supports sustainability goals in each district. Regular meetings with these staff ensure effective communications on programs offered in their district and ensure Eco-Cycle supports the needs of the school district and individual schools. These staff support introductions and updates connections with school administrators and custodial and food service managers. While there are currently no GSS schools in Adams 12 Five Star, Eco-Cycle has been coordinating with their Energy and Sustainability Manager to introduce the program to schools in this district in the near future.

Within each district, Eco-Cycle also partners with the food service departments. Eco-Cycle works with the departments to promote and implement reusable food serviceware (when conditions permit) during lunch service. At new GSS schools, Eco-Cycle delivers educational training on how to compost and recycle properly. Kitchen containers and signage for compost and recycling are offered at each location. Eco-Cycle partners with food service departments to train and support students' use of food rescue stations when present. Food service departments may request educational training at any time, onsite at schools, or during professional development

GSS also partners with the custodial service departments, working closely with head custodians and regional managers to implement the GSS Program in each school. Custodians provide valuable information and feedback on how waste management systems are functioning. Eco-Cycle works with them to design classroom, hallway, and cafeteria sorting stations to fit their space and systems. Custodians help determine the type of outdoor recycle and compost containers and the placement of those containers.

Eco-Cycle also has partners outside of the school system. Eco-Cycle partners with trash, recycling, and compost haulers to provide services and feedback to schools and school districts. Data is made available according to the school districts' hauling contracts. Eco-Cycle also partners with local counties, cities, and towns which provide funding to make the GSS Program accessible to schools in their jurisdiction. These include the Town of Superior, the City/County of Broomfield, the City of Boulder, the City of Longmont, and Boulder County.

Similar services or projects in the area:

Eco-Cycle's GSS Program is unique to the Colorado Front Range.

The GSS Program is Colorado's only comprehensive, full-service school waste reduction program. The GSS Program began in 2005 with the first GSS school in BVSD. The program later expanded to SVVSD. As Boulder County was the primary founder of the GSS Program, it has been limited to schools located within Boulder County. With limited support from the City/County of Broomfield, the first Broomfield school became part of the GSS Program in spring 2024. There are currently 65 GSS schools in Boulder County and one in Broomfield County.

During the 2023-24 school year, Eco-Cycle received funds from municipalities to provide Reusable Zero Waste Event Kits in Boulder County and Broomfield. 22 kits were distributed to the Town of Superior schools. 21 kits were distributed to City/County of Broomfield schools. In the fall of 2024, 20 kits will be distributed to Title 1 schools in Boulder County with funding awarded to Eco-Cycle from the Circular Economy Fund. Eco-Cycle is not aware of any organization providing similar services to promote reuse to public schools in the Front Range.

Project work plan

Timeline:

Fall 2024

In coordination and with approval from each district, Eco-Cycle will contact each eligible school to determine their interest in the GSS Program for the 2024-25 school year.

The goal will be for two to three schools to join the GSS Program during the 2024-25 school year.

In January 2025, Eco-Cycle will contact schools eligible to apply for Reusable Zero Waste Event Kits. Awarded kits will be delivered during the spring semester of 2025.

Spring 2025

In coordination and with approval from each district, Eco-Cycle will contact each eligible school to determine their interest in the GSS Program for the 2025-26 school year.

Fall 2025/Spring 2026

The goal will be to add two to three more schools during the 2025-26 school year to get a total of six GSS schools added through this project.

Spring 2026

In coordination and with approval from each district, Eco-Cycle will contact any remaining eligible schools to determine their interest in the GSS Program for the Fall of 2026.

Fall 2026

The goal will be to add any remaining schools to reach a total of six new GSS schools from the list of eligible schools.

Activities / Deliverables	Staff responsible	Due date
Contact each eligible school to determine their interest in the GSS Program for the 2024-25 school year	Eco-Cycle, Kim Orr	November 30th, 2024
Biannual Report Fall 2024 Activities	Eco-Cycle, Kim Orr	December 31, 2024

Biannual Report Spring 2025 Activities	Eco-Cycle, Kim Orr	June 30, 2025
Biannual Report Fall 2025 Activities	Eco-Cycle, Kim Orr	December 31, 2025
Biannual Report Spring 2026 Activities	Eco-Cycle, Kim Orr	June 30, 2026
Biannual Report Fall 2026 Activities	Eco-Cycle, Kim Orr	December 31, 2026
Project completion date	Eco-Cycle, Kim Orr	January 1, 2027
SEP completion report due	Eco-Cycle, Kim Orr	January 15, 2027

Expected environmental and/or public health measures/results

Please detail expected environmental and/or public health benefits of this project, quantifying the environmental benefits to the extent possible and providing calculations and any underlying assumptions.

The Town of Erie is home to the Front Range Landfill. In 2021, when Erie completed its first town-wide comprehensive greenhouse gas inventory, the Front Range Landfill was identified as the largest single emissions source for the town with 1,747,016 tons of collected waste and 109,280 mt of CO₂e emissions. 5% of these emissions are estimated to be the result of materials landfill by Erie residents or 12,996 tons and 3,707 mt of CO₂e emissions. The GSS Program and its implementation of compost collection in six schools will directly reduce the amount of organic material at the Front Range Landfill, therefore reducing methane and related emissions locally. In addition, the education and outreach component of the GSS Program will contribute to a larger behavioral shift for the students in these schools along with their parents and the larger community, influencing a broader impact beyond the school borders.

Methane and related landfill emissions are borderless and affect areas beyond Erie’s borders. This is similarly true of the materials that are collected at the Front Range Landfill, sourced from municipalities throughout the Northern Front Range. As a result, the implementation of the GSS Program will improve public health impacts in Erie and beyond but also reduce potent greenhouse gas emissions for the State and nation.

Project budget

Complete the summary table below and itemize expenses according to the budget categories provided. Add rows as necessary. Documentation of all expenditures is required as part of the completion report.

Category	Description	SEP Funds	Matching funds (if applicable)	Total cost
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Personnel - salaries, wages (including rates and # of hrs.)	Project Admin and Education at 6 GSS schools (\$54.22/hr, est 225 hours per school, includes all components of GSS Program described above)	\$73,197.00		\$73,197.00
	Zero Waste Event (ZWE) Project Admin (\$40/hr, est 77 hours to order, assemble, announce, and deliver)	\$3,080.00		\$3,080.00
Materials and supplies	ZWE Kit Materials (20 sets of 30 reusable plates (\$200), cups (\$200), spoons (\$80), forks (\$120), and napkins(\$650) in a tote (\$135) delivery \$30)	\$1,415.00		\$1,415.00
	Guidelines/Signage	\$1,200.00		\$1,200.00
	Student Prizes/Promotions	\$300.00		\$300.00
Equipment	Compost containers	\$3,300.00		\$3,300.00
Contractors / subcontractors	NA			
Other Direct Costs	GSS Mileage	\$2,398.00		\$2,398.00
	ZWE Kit Mileage	\$110.00		\$110.00
Total:		\$85,000		\$85,000

Please note: Any categorical changes exceeding 10% of the total budget require prior written approval from CDPHE through a SEP Modification.

Budget discussion

Describe how all costs were determined and how they relate to the project. Describe the availability of funding for this project from sources other than SEP contributors. Include sources of funding, secured and applied for, directly related to this SEP.

Eco-Cycle's GSS Program began in 2005. 66 GSS schools span two school districts and two counties. The costs for this project are estimated time and staff compensation rates based on the program's long history. Because these expenses are estimated, Eco-Cycle will donate time and resources that exceed up to 10% of the project costs to ensure project completion.

While the GSS Program is funded through many sources, those current funding sources limit access to the program. There are currently no funding sources to bring the GSS Program to the eligible locations during the designated time frame.

Eco-Cycle delivered 43 Reusable Zero Waste Event Kits during the 2023-24 school year. The described project follows the same pattern. Known expenses from the previous project were used to calculate the costs.

Other relevant information

Include any additional information necessary to fully evaluate the SEP proposal. Please detail the extent to which the project goes beyond any city, state or federal requirements if applicable. Indicate other benefits to the source (i.e. process efficiencies) resulting from the implementation of this project.

There are no applicable city, state, or federal requirements for waste diversion from landfills, including Erie based Front Range Landfill. Therefore, this program will provide an environmental benefit that is not met by existing regulatory requirements.

Additional application materials include three letters of support from related school entities:

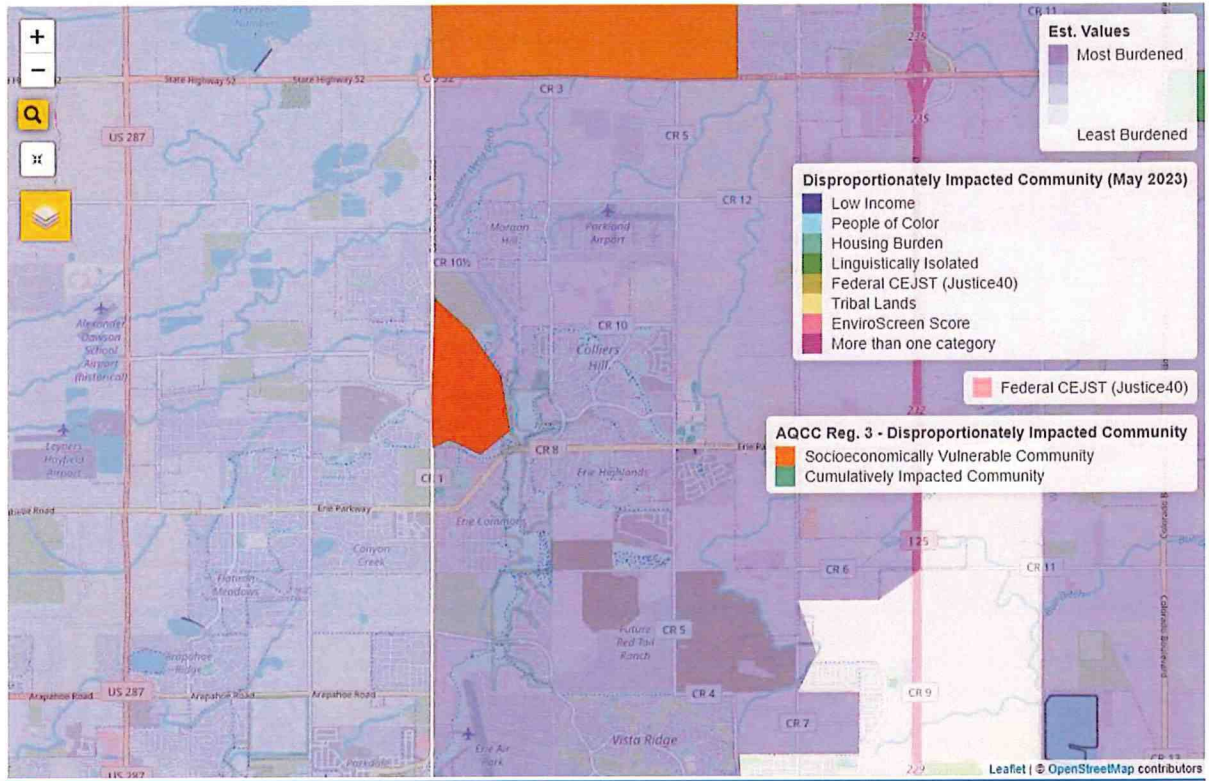
- Letter of support from Garrett McDaniel, Community Sustainability Manger for the City and County of Broomfield
- Letter of support from Ghita Carroll, Sustainability and Energy Officer for Boulder Valley School District
- Letter of support from Curtis Leonard, Energy and Sustainability Specialist for St. Vrain Valley School District

Photos or maps related to the project

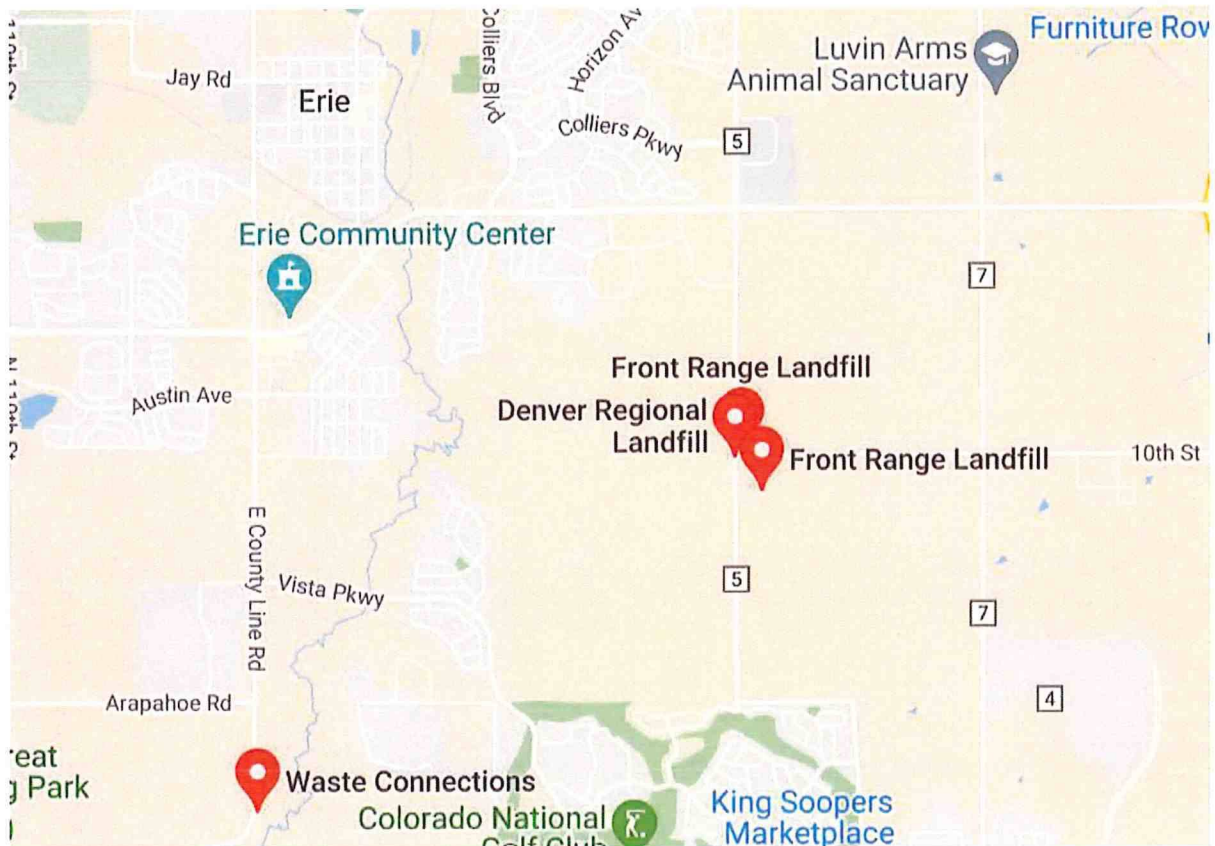
Town of Erie CDPHE SEP eligible schools:

https://www.google.com/maps/d/edit?mid=1rQZvOwnSD1Tp4G6YFrMFGH4x_UOPEi&usp=sharing

CO EnviroScreen Analysis:



The proximity of the landfill to Erie:



Reporting requirements

Biannual status reports

The SEP administrator will submit a biannual project status report to the department's SEP coordinator. Status reports will include, at a minimum, the following information and be submitted using the department's status report form:

- A description of activities completed to date;
- A budget summary table listing funds expended to date by budget category; and
- A discussion of any anticipated changes to the project scope or timeline.

SEP completion report

The SEP administrator will submit a SEP completion report to the department's SEP coordinator within 30 days of project completion and contain at a minimum:

- A detailed description of the project as implemented;
- A summary table identifying project deliverables and tasks along with the associated completion date;

- A description of any operating problems encountered and the solutions thereto;
- A full expense accounting including itemized costs, documented by copies of purchase orders, contracts, receipts or canceled checks;
 - SEP Administrators should redact any potentially sensitive account information from any documentation, such as bank account numbers and personal identifying information (PII).
- Certification and demonstration that the SEP has been fully implemented pursuant to the provisions of the Settlement Agreement and this SEP Agreement;
- A description of the environmental and public health benefits resulting from implementation of the SEP along with **quantification** of the outcomes and benefits. The impact of the GSS Program will be measured in a few ways. Eco-Cycle's GSS schools' reports will detail the activities, grade levels, number of participants at each GSS school. Reports will also include the results of the pre and post behavioral assessments. Compost, recycling, and trash data will be provided in coordination with each school's haulers and the school district.

Additional information will include:

- Examples of brochures, educational or outreach materials developed or produced as part of the SEP; and
- Photographs documenting the project.

Third-party SEP administrator conditions and requirements

Only qualified tax-exempt 501(c)(3) nonprofits or governmental organizations are eligible to serve as the SEP administrator. The SEP administrator agrees to the following SEP conditions and requirements:

- I. Maintain the SEP funds paid by the regulated entity in an independent SEP account and draw funds from the account as-needed for the purposes outlined in this SEP agreement.
- II. Communicate issues and concerns related to the SEP promptly to the department SEP coordinator.
- III. If the SEP administrator elects to publicize the name of a violator in connection with the SEP either orally or in writing, the SEP administrator must also include the following statement: *"This project was undertaken in connection with the settlement of an enforcement action taken by the Colorado Department of Public Health and Environment for violations of environmental laws and regulations"*.
- IV. Complete the SEP as described in this SEP agreement
 - a. Any changes to the approved project scope or timeline must receive prior written approval from the department.
 - b. Budget reallocations of up to 10% of the total SEP payment amount may be made without prior authorization. Budget reallocations of over 10% must first receive written prior authorization from the department.
- V. Complete the SEP within the time frame(s) indicated in this SEP agreement. If the SEP

administrator is unable to meet the SEP agreement time frame(s) for the completion of the SEP, the SEP administrator may request a deadline extension in writing from the department no later than 30 days prior to the deadline.

- VI. In any of the following situations, all funds remaining in the SEP account shall be released to the department within 30 days of the department's written request:
- a. The SEP administrator fails to complete the project or submit the SEP completion report;
 - b. The project has been fully implemented and there are still funds remaining in the SEP account; or
 - c. The department terminates the SEP for failure of the third-party SEP administrator to adhere to this SEP agreement.
- VII. Make available, at the department's request, all records pertaining to the SEP.
- a. The SEP administrator shall maintain a complete file of all records, documents, communications, and other materials that pertain to the operation of the SEP or the delivery of services under the SEP agreement. Such files shall be sufficient to properly reflect all direct and indirect costs of labor, materials, equipment, supplies and services.
 - b. The SEP administrator authorizes the department to perform audits and/or inspections of its SEP records, at any reasonable time during the implementation of the project and for a period of one (1) year following the completion of the project.

Failure to adhere to any of the above conditions and requirements may result in the termination of the SEP and/or no further SEP referrals.

This section to be completed in the event of a SEP Agreement only

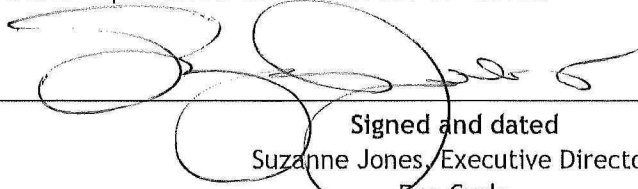
Certification statement

I, ~~Todd Fessenden, Town of Erie Utilities Director~~, ^{Justin Brooks, Mayor Pro Tem} ~~Sara Loflin, Utilities Director~~, certify on behalf of the Town of Erie, that the Town of Erie agrees to implement the project as described in this document and that the Town of Erie has not entered into any prior commitments to fund this project, voluntary or otherwise.



Sara Loflin, ^{Justin Brooks, Mayor Pro Tem} ~~Todd Fessenden, Utilities Director~~
Town of Erie

I, Kim Orr, Director, certify on behalf of Eco-Cycle, that Eco-Cycle administrator is not required or has not previously committed to perform this project and agrees to the SEP conditions and requirements detailed in this document.

 9/4/2024
Suzanne Jones, Executive Director
Eco-Cycle

 9/4/2024
Kim Orr, School Recycling and Environmental Education Director
Eco-Cycle

Department use only

This SEP has been reviewed and approved by the Colorado Department of Public Health and Environment.

Nathan T. Moore Digitally signed by Nathan T. Moore
Date: 2024.09.03 12:35:03 -06'00'

Signed and dated
Nathan Moore, Clean Water Program Manager
Water Quality Control Division
Colorado Department of Public Health and Environment

Alex Scherer Digitally signed by Alex Scherer
Date: 2024.09.03 13:02:21 -06'00'

Signed and dated
Alex Scherer, Supplemental Environmental Projects Coordinator
Environmental Justice Program - Administration Division
Colorado Department of Public Health and Environment